

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF RHODE ISLAND**

WESCO INSURANCE COMPANY,

*Plaintiff,*

v.

C.A. No. 1:19-cv-00332

CENTRAL FALLS DETENTION FACILITY  
CORPORATION, WILDER ARBOLEDA,  
GARY BERDUGO, JOSEPH MOLINA  
FLYNN, HERMAN YIP and UMB BANK,  
N.A., as Trustee,

*Defendants.*

**JOINT MOTION TO EXTEND DEFENDANTS' TIME TO RESPOND TO  
COMPLAINT**

Pursuant to Local Rule Cv 29(b), Plaintiff and Defendants jointly request an order granting Defendants until and including October 10, 2019 to respond to Plaintiff's complaint. In support hereof, the parties state as follows:

1. Plaintiff commenced this action on June 18, 2019. Plaintiff seeks, *inter alia*, a declaratory judgment regarding the applicability of insurance coverage under a policy issued by it in connection with a demand for coverage by certain of the Defendants arising out of the matter captioned *UMB Bank, N.A. as Trustee v. City of Central Falls, et al.*, 19-cv-00182-WES-PAS ("Underlying Lawsuit").

2. By text order dated July 11, 2019, this Court stayed the Underlying Lawsuit until September 24, 2019 ("Stay").

3. The parties believe that judicial economy would be best served by gaining an understanding of how the Underlying Lawsuit may proceed after the expiration of the Stay.

4. Accordingly, the parties wish to preserve their resources and the Court's resources by deferring responses to Plaintiff's complaint until shortly after the expiration of the Stay in the Underlying Lawsuit.

WHEREFORE, the parties respectfully request entry of an order granting (a) this Joint Motion such that Defendants shall have until and including October 10, 2019 to respond to Plaintiff's Complaint; and (b) further appropriate relief.

**LOCAL RULE 7(c) STATEMENT:**

No oral argument requested.

**WESCO INSURANCE COMPANY**

By its Attorneys,

/s/ David W. Zizik

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**CENTRAL FALLS DETENTION  
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CORPORATION**

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**WILDER ARBOLEDA, GARY BERDUGO,  
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FLYNN, HERMAN YIP**

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**UMB BANK, N.A., AS INDENTURE  
TRUSTEE,**

By its Attorneys,

/s/ Adrienne K. Walker

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**CERTIFICATION**

I hereby certify that on July 24, 2019, I electronically filed and served this document through the electronic filing system with notice to counsel of record. The document electronically filed and served is available for viewing and/or downloading from the Rhode Island Judiciary's Electronic Filing System.

/s/ Brian J. Lamoureux